

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No. 4:23-CR-380
)
SONNY SAGGAR, M.D., and)
RENITA BARRINGER,)
)
Defendants.)

DEFENDANT SONNY SAGGAR'S MOTION TO MODIFY BOND CONDITIONS

As the Court is aware, Dr. Saggar was employed by hospitals in Sedalia, Missouri (150 miles away) and Marion, Illinois (100 miles away). Due to the Indictment, he has been dismissed from the Marion hospital. However, he is still on staff at Bothwell Regional Health Center in Sedalia. When on duty, he works 12+ hour shifts. The drive to and from takes multiple hours. When he is on duty, he works two or three days in a row. Under the current bond conditions, Dr. Saggar "is authorized to travel to SDIL and WDMO for employment purposes only." Therefore, Dr. Saggar seeks a modification to his bond conditions which would allow him stay overnight within Sedalia to accommodate his employment, which would include staying overnight the night before shifts starting at 7 am, and the night after shifts which end at 7 pm. Pretrial Services has indicated they do not oppose this request.

The hours presently scheduled, if permitted by the Court, are as follows:

a) **8/16, 8/17, both 7am-7pm dayshifts.**

Dr. Saggar seeks to be permitted to leave his residence around 2pm on 8/15 and return on 8/18 by 1pm.

b) 8/25, 8/26, both 7am-7pm dayshifts

Dr. Saggar seeks to be permitted to leave his residence around 2pm on 8/24 and then return on 8/27 by 1pm.

c) 8/30, 8/31, both 7pm-7am nightshifts.

Dr. Saggar seeks to be permitted to leave his residence around 10am on 8/30 and return on 9/1 around 4pm.

Wherefore, Dr. Saggar respectfully requests that his bond conditions be modified to allow staying overnight in or near Sedalia when related to work.

Dated: August 7, 2023

Respectfully submitted,

DOWD BENNETT LLP

By: /s/ James G. Martin

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Attorneys for Defendant Sonny Saggar, M.D.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 7, 2023, a copy of the foregoing was filed electronically via this Court's CM/ECF system, and therefore served on all parties of record.

/s/ James G. Martin
James G. Martin